

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
McALLEN DIVISION**

IN RE:	§	BANKRUPTCY CASE NO.
	§	
RAYMOND ROBERT DERR, JR.,	§	04-70644
	§	
DEBTOR.	§	CHAPTER 13

**DEBTOR'S RESPONSE TO MOTION OF NATIONWIDE SERVICES, INC. TO
DISMISS CASE**

COMES NOW RAYMOND ROBERT DERR, JR., Debt or, files this his Response to Motion of Nationwide Services, Inc. to Dismiss Case, and in support thereof, would respectfully show:

1. Debtor admits the allegations contained in paragraph 1 of Nationwide Services, Inc.'s Motion to Dismiss Case that ("Movant's Motion") that Debtor failed to attend a 341 meeting, denies the other allegations, and opposes the relief sought by Movant's Motion.

2. Debtor would show that his failure to attend the 341 meeting was a result of a scheduling error wherein he had scheduled a meeting in Mexico for a business prospect that, had it been successful, would have allowed Debtor to pay all creditors in full.

3. Debtor requests a hearing and prays that said motion be denied.

WHEREFORE, PREMISES CONSIDERED, Debtor prays that the Nationwide Services, Inc.'s Motion to Dismiss Case be DENIED.

Respectfully submitted,

/s/Kelly K. McKinnis

KELLY K. McKINNIS

Southern Dist. ID No. 10266

612 Nolana, Suite 240

McAllen TX 78504

(956)686-7039

(956)686-8261 facsimile

ATTORNEY FOR DEBTOR

CERTIFICATE OF SERVICE

I certify that on November 10, 2004, a true copy of this document was transmitted via electronic court mail to Antonio Villeda, 5414 N. 10th, McAllen, TX 78504, and to Trustee Cindy Boudloche, 555 N. Carancahua, Suite 600, Corpus Christi TX 78478, each via electronic court mail, as well as to all parties who have filed electronic notices of appearance.

/s/Kelly K. McKinnis

Kelly K. McKinnis